

RECEIVED FEDERAL ELECTION COMMISSION

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October 16, 2009

Thomasenia P. Duncan General Counsel Federal Election Commission 999 E Street, N.W. Washington, D.C. 20463

MUR# 6225

Re: Utah Attorney General Mark Shurtleff's Violations of Federal Law

Dear Ms. Duncan:

PARK CITY

P.O. Box 3390

314 Main Street, Suite 200

Park City, Usak 84060-3390

Telephone: (435) 649-0077

Facsimile: (435) 649-2561

This letter has been prepared to serve as a formal complaint against Utah's Attorney General, Mark Shurtleff, for violations of the federal campaign finance laws during his campaign for United States Senate.

As outlined in detail below, Mr. Shurtleff, as Utah's chief law enforcement official, may have flouted federal law and has unlawfully tapped "soft money" raised under the very lenient Utah campaign-finance laws, to support his campaign for federal office. It is as a result of these possible violations that I am respectfully requesting that the Federal Election Commission ("Commission") investigate Mr. Shurtleff's conduct in this regard, and ultimately hold him accountable for any violations of federal law.

#### ANALYSIS: ATTORNEY GENERAL SHURTLEFF IS UNLAWFULLY L SUPPORTING HIS FEDERAL CANDIDACY WITH "SOFT MONEY"

It appears probable that Mr. Shurtleff has used and is using state-raised "soft money" to subsidize his federal election campaign. As the Commission once noted, "many states impose fewer restrictions [than federal law] on contributions to campaigns for state elective offices." Utah is one such state. Unlike federal law, Utah imposes no limitation on the amount of contributions from either individuals and/or corporations.<sup>2</sup> For this reason, Commission regulations expressly forbid:

[t]ransfers of funds or assets from a candidate's campaign committee or account for a non-federal election to his or her principal campaign committee or other

<sup>&</sup>lt;sup>1</sup>58 Fed. Reg. 3474, 3474 (Jan. 8, 1993).

<sup>&</sup>lt;sup>2</sup>Peter Christianson, et. al., Lobbying, PACs & Campaign Finance; 50 State Handbook § 46:91 (2009).

#### authorized committee for a federal election.3

Moreover, a federal candidate may not spend state-raised funds in federally impermissible amounts or from federally impermissible sources "in connection with" a federal election.

It appears probable that Mr. Shurtleff is violating these clear prohibitions on transfer and use of "soft money" in at least three ways: (1) he used "soft money" to prepare for his U.S. Senate bid; (2) he has formed a joint fundraising committee that unlawfully subsidizes and supports his federal candidacy with "soft money"; and (3) he appears to be illegally spending "soft money" to finance his ongoing federal campaign.

### A. Mr. Shurtleff Illegally Spent State-Raised Money to Support Preparations for His united States Senate Campaign.

Mr. Shurtleff violated federal law if he used state-raised "soft money" to finance so-called "testing the waters" activities in preparation for his federal candidacy, so it appears that he has done. Mr. Shurtleff established a considerable "testing the waters" operation apparently that was unlawfully financed by state-raised funds. Before Mr. Shurtleff formally launched his candidacy, he actively assessed whether his Senate bid would be viable through three main activities'.

First, Mr. Shurtleff commissioned, in his words, "significant polling" to gauge a potential race against incumbent Senator Robert Bennett.<sup>6</sup> The polling asked about issues that were entirely federal in nature, such as the recent financial bailout packages, the American Recovery and Reinvestment Act of 2009, and federal government appropriations known as "earmarks". The polling also queried participants about a head-to-head campaign between Mr. Shurtleff and

<sup>&</sup>lt;sup>3</sup>11 C.F.R. §110.3(d). See also 58 Fed. Reg. 14310, 14311 (Mar. 17, 1993) ("[t]he rule applies to transfers from any non-federal campaign committee, including campaign committees for any state or local office."); 57 Fed Reg. 36344, 36344 (stating that the rule addresses situations in which "candidates for federal office who were once candidates for state office have state campaign committees with funds leftover from a state campaign" and "wish to transfer these funds to their federal campaign committees for use in the federal campaign.") 57 C.F.R. 36344 (August 12, 1992).

<sup>2</sup> U.S.C. §441i(e); 11 C.F.R. § 300.61.

<sup>&</sup>lt;sup>5</sup>11 C.F.R. § 100.72 (describing the so-called "testing the waters" exemption).

<sup>&</sup>quot;Matt Canham, Shurtleff Laying Groundwork for Run vs. Bennett, The Salt Lake Tribune, Mar. 5, 2009 ("Shurtleff said he has also done some 'significant polling' and the results make him only more eager to run. 'He's vulnerable. He knows it,' he said."); See also Paul Rolly, Obama is President, So Deal with it, The Salt Lake Tribune, Feb. 27, 2009 ("Utah Attorney General Mark Shurtleff commissioned a poll that was completed this week showing Sen. Bob Bennett is vulnerable to a Republican challenge to his bed for a fourth term next year, Shurtleff confirmed Thursday.").

<sup>&</sup>lt;sup>7</sup>Michael Teitelbaum, Utah's Election Process May Get a Workout in 210 Senate Race, CQ politics Blog (Mar. 27, 2009 at 12:30 ET), <a href="http://www.capolitics.com/wmspage.cfm?parm1=5&zdoc1D=news-0000030862334">http://www.capolitics.com/wmspage.cfm?parm1=5&zdoc1D=news-0000030862334</a> ("[Shurtleff] said he has done substantial polling of both Republican delegates and primary voters and they have told him that the economy, the financial bailout package, the stimulus law and earmarks are "huge issues in the state."").

Senator Bennett. Because the polling solely concerned federal election matters, its costs should have been paid entirely with funds obtained within appropriate federal guidelines.

Second, Mr. Shurtleff took a March 2009 trip to Washington, D.C. that was partly for the purpose of soliciting advice from fundraising and political consultants about Shurtleff's U.S. Senate run.<sup>9</sup> Commission regulations stipulate that federally regulated funds must defray a portion of a trip's costs if a federal campaign-related activity occurs at a destination.<sup>10</sup> Thus, Mr. Shurtleff should have paid for at least part of his Washington, D.C. trip with federal campaign dollars, but his Senate campaign's first disclosure report to the Commission showed no such payment.<sup>11</sup>

Third, Mr. Shurtleff "Ia[id] the groundwork for a campaign" <sup>12</sup> and sponsored "field work" in early 2009 – well before his campaign formally began. <sup>13</sup> Because Mr. Shurtleff is not up for re-election as Attorney General until 2012, it can be fairly concluded that these political operations were to influence next year's federal elections. Mr. Shurtleff, therefore, should have used federally limited contributions to finance these federal election outreach efforts and field operations.

The prohibitions on transferring and using state-raised funds in federal campaigns also apply to federal "testing the waters" activities. <sup>14</sup> In a previous Commission enforcement matter, Mike Huckabee, then Lieutenant Governor of Arkansas, used his state campaign committee's funds to pay for polling, travel, and outreach activities that were designed to evaluate his viability

John McArdie, Bailout Relief Causing Hearthurn for Bernett?, Roll Call, Mar. 19, 2009 ("[Shurtleff] is already moving ahead with fundraising in Washington, D.C. and Utah, and he has conducted polling to find out how he would fare against the three-term Senstor [Robert Bennett].").

Matt Canham, Shurtleff Laying Groundwork for Run v. Bennett, The Salt Lake Tribune, Mar. 5, 2009 ("Utah Attorney General Mark Shurtleff, who huddled with some D.C. fundraisers Wednesday, while in town for a meeting of the National Association of Attorneys General."); John McArdle, Bailout Relief Causing Heartburn for Bennett?, Roll Call, Mar. 19, 2009 ("[Shurtleff] is already moving ahead with fundraising in Washington, D.C."); Paul Rolly, Obama is President, So Deal with It, The Salt Lake Tribune, Feb. 27, 2009 ("Shurtleff is traveling to Washington, D.C. on Sunday for official attorneys general meetings and will "talk to folks" there about running for the Senate.").

<sup>1011</sup> C.F.R. § 106.3(b)(3).

<sup>&</sup>lt;sup>11</sup>Friends for Shurtleff, Inc. July 2009 Quarterly Report to the Federal Election Commission (Exhibit 1, attached hereto.)

<sup>&</sup>lt;sup>12</sup>Ales Isenstadt, *Utah's Bennett Facing Primary Fight*, Politico Blog, Mar. 23, 2009 at 4:43 ET), http://www.politico.com/news/stories/0309/20347.html.

<sup>&</sup>lt;sup>13</sup>Andrew Adams, Shurtleff Considers Run for Senate, KSL Local Blog (Feb. 26, 2009), http://www.ksl.com/?nid=148Rsid=5703170 (""I thought that I need to, first of all, talk to some advisors, do some filed work, do some polling, see what it looks like. I've done all of that" he says.").

<sup>&</sup>lt;sup>14</sup>See 11 C.F.R. § 100.72(a) ("Only funds permissible under the Act may be used for [testing-the-waters] activities").

as a candidate in Arkansas' 1996 U.S. Senate campaign. The Commission's Office of General Counsel found these payments to be unlawful because Mr. Huckabee's state committee "could not ... Use funds it could not otherwise legally have transferred to make direct expenditures on behalf of a potential Huckabee federal campaign. In that case, the Commission voted unanimously to find probable cause to believe Huckabee's state committee "us[ed] prohibited contributions to pay for 'testing the waters' expenses of behalf of the Senate4 Committee. Similarly, when a Georgia State Senator's state committee commissioned a public-opinion poll about her potential U.S. House campaign and shared the results with her federal "testing the waters" organization, the Commission unanimously found that state-raised funds were impermissibly transferred and used.

Mr. Shurtleff's polling, travel and political outreach activities appear similar to past Commission enforcement matters in which state-raised "soft money" funded federal "testing the waters" efforts. None of the three federal-election activities enumerated above are shown on the July Quarterly report filed with the Commission by General Shurtleff's Senate campaign. This means either that the Shurtleff campaign did not pay for these activities or that the report is false. Payment apparently came from a "soft money" source. If Guidant Strategies — a consulting firm to which the Shurtleff campaign owes \$23,131.56 — advanced these expenses on the campaign's behalf, this would be an unlawful corporate in-kind contribution. If Guidant Strategies did not defray these costs, the Shurtleff campaign illegally tapped "soft money" in Shurtleff's state campaign must have and/or leadership PAC accounts.

Like candidates in those past Commission enforcement matters, this complaint respectfully asks that the Commission uphold its precedent, to investigate this matter fully, and, if warranted, and find that Mr. Shurtleff illegally used "soft money" on federal election expenses.

<sup>&</sup>lt;sup>15</sup>Fed. Election Comm'n, MURs 4317 and 4323 First General Counsel's Report at 19-25 (Oct. 7, 1996).

<sup>&</sup>lt;sup>16</sup>Id. at 21 (Oct. 7,1996). See also Fed. Election Comm'n, MUR 4974 (2003 (candidate's federal and state committees violated 11 C.F.R. 110.3(d) when his state committee made a contribution to, and incurred expenses on behalf of his federal committee); Fed. Election Comm'n, MUR 5426 (2005 (finding a violation of 11 C.F.R. 110.3(d) where a state committee incurred expenses on behalf of an individual's federal candidacy).

<sup>&</sup>lt;sup>17</sup>Fed. Election Comm'n. MURs 4317 and 4323 Statement of Reasons at 2 (June 15, 1999).

<sup>&</sup>lt;sup>18</sup>Fed. Election Comm'n, MUR 5480 Certification at 1 9june 21, 2005); Fed. Election Comm'n, MUR 5480 First General Counsel's Report at 3-7 (June 10, 2005). See also Fed. Election Comm'n, MUR 4646 (finding probable cause to believe that a violation of 11 C.F.R. § 110.3(d) occurred where a state officeholder used non-federal funds to finance start-up activities for his U.S. Senate Campaign); Fed. Election Comm'n, MUR 5722 (stating that non-federal funds may not finance "testing the waters" activities, but dismissing the matter due to the de minimis amount involved).

<sup>&</sup>lt;sup>19</sup>Friends for Shurtleff, Inc. July 2009 Quarterly Report to the Federal Election Commission (Exhibit 1, attached hereto.)

<sup>&</sup>lt;sup>20</sup>11 C.F.R. §§ 100.52(d)(1)-(2), 116.3. The polling and field work was conducted in February 2009, and it is not commercially reasonable for a non-banking firm to extend five month's credit. Guidant Strategies is not in the travel business, so it would be unlawful for Guidant to pay Mr. Shurtleff's travel expenses.

### B. Mr. Shurtleff Has Formed a Joint Fundraising Committee that Unlawfully Subsidizes and Supports His Federal Candidacy with "Soft Money"

As an apparent strategy, Mr. Shurtleff appears to have repeatedly explored schemes and would allow him to utilize unregulated "soft money" to aid his Senate campaign. Mr. Shurtleff's latest attempt to raise non-federal funds is "Shurtleff Joint Fund", a federal joint fundraising committee composed of his Senate campaign and PAC for Utah's Future, a non-federal Utah committee that he chairs. According to a Shurtleff Joint Fund event invitation, contributions to the joint fundraiser will be divided as follows:

Contributions permissible for the senatorial committee will be attributed to the senatorial committee. (Individuals, sole proprietorships, partnerships, and LLCs treated as partnerships may contribute \$2,400 per election, and federal multi candidate PACs may contribute \$5,000 per election.) Other contribution amounts will be attributed to a separate account of PAC for Utah's Future and used for non-election purposes, such as occasional charitable donations, or other purposes permitted by law.<sup>23</sup>

For two reasons, this statement appears to flagrantly defy the ban on a federal candidate spending state-raised "soft money" for federal election activities:<sup>24</sup>

First, "soft money" will heavily subsidize the Senate campaign's fundraising efforts under

<sup>&</sup>lt;sup>21</sup>Mr. Shurtleff had reportedly considered a scheme where he would, under color of Utah state law, make an indirect transfer from his Utah state committee to his federal campaign. Robert Gehrke, New State Law Could Open Backdoor for Federal Candidates, The Salt Lake Tribune, Apr. 10, 2009. A recently passed state law does indeed authorize a former state candidate to transfer monies "to a campaign account for federal office," but making such a transfer would be an obvious violation of federal law. Utah S.B. 162 (2009 Session). To rejterate, federal law strictly bans "[transfers of funds or assets from a candidate's campaign committee ... for a nonfederal election to his or her principal campaign committee ... for a federal election." 11 C.F.R.§ 110.3(d0. See also 58 Fed. Reg. 14310, 14311 (Mar. 17, 1993). Mr. Shurtleff's plan would have attempted an end-run around this ban by making the transfer indirectly - Mr. Shurtleff would have first taken personal possession of funds left in his Utah state committee and then loaned his federal campaign these same funds. Mr. Shurtleff has abandoned this plan - at least temporarily - because he believes himself capable of raising sufficient amounts of federal "hard" money. If Mr. Shurtleff were to ever actually attempt this, we believe that the Commission should disregard use of transactional "straw men", as it has in the past. Fed. Election Comm'n Adv. Op. 1996-33 at 2 (1996); 67 Fed Reg. 54366, 54372 (Aug. 22, 2002) (citing 54 Fed. Reg. at 8581 (Nov. 24, 1989). Mr. Shurtleff should not be allowed to accomplish "indirectly what [he is] prohibited from doing directly." The Commission should declare this scheme illegal to prevent any possibility of this blatant circumvention of federal law.

Mark Shurtleff is listed as the "Executive Board Leader" for the PAC for Utah's Future on IRS Form 8871 (http://forms.irs.gov/politicalOrgsSearch/search/Print.action?formId=33390&formType=E71). He is listed as the only "Governing Board Member" on Utah state campaign finance disclosure documents. (https://gva1.utah.gov/disclosures/SOOPDF.aspx?id=3141).

<sup>&</sup>lt;sup>23</sup>Shurtleff Joint Fund Invitation (Exhibit 2, attached hereto).

<sup>&</sup>lt;sup>24</sup>2 U.S.C. § 441i(e); 11 C.F.R. § 300.61.

this joint-committee structure. If the Senate campaign raised funds alone, it would bear all costs (e.g., mailing invitations, venue rental, food and beverage, fundraising consultant fees). By raising money through a joint-committee structure, Mr. Shurtleff appears to be unlawfully allocating obvious Senate campaign's fundraising expenses onto the soft-money-financed PAC for Utah's Future. The Commission's joint fundraising regulations call for "each participant's share of expenses [to be] based on the percentage of the total receipts each participant had been allocated." PAC for Utah's Future can accept unlimited contributions from nearly any source, while the Senate campaign may only raise limited funds from individuals and PACs. PAC for Utah's Future will therefore almost certainly receive a substantial percentage of the Shurtleff Joint Fund's total receipts and pay a considerable amount of its fundraising expenses.

For example, if Shurtleff Joint Fund held an event where 25 attendees gave \$2,400, it would take only one corporate contribution of \$60,000 for the Senate campaign to offload 50 percent of the event's costs onto PAC for Utah's Future. Given that the Senate campaign would have paid all event expenses under normal circumstances, this arrangement offers Mr. Shurtleff's federal candidacy a sizeable "soft money" subsidy. While this is true to some extent with other joint fundraising efforts that link federal and non-federal committees, Shurtleff Joint Fund should be investigated with respect to its obvious intent. PAC for Utah's Future is tax-exempt under federal law insofar as it "influenc[es] or attempt[s] to influence the selection, nomination, election, or appointment" of political candidates. Why would a group supposedly dedicated to influencing elections spend funds and pay taxes just to fill a "non-election" account? The apparent answer is that Mr. Shurtleff believes he can relieve his cash-strapped campaign's financial burdens by collecting significant contributions he has regularly obtained under Utah law. The Commission should act to stop this apparent "soft money" subsidy as soon as possible.

The second reason that the Shurtleff Joint Fund scheme violates the "soft money" ban is Mr. Shurtleff apparently intends to use the Utah PAC's share of net proceeds to indirectly support his election. Again, Shurtleff Joint Fund claims that all monies allocated to PAC for Utah's Future will be deposited in a "non-election account" and used for "non-election purposes, such as occasional charitable donations, or other purposes permitted by law."

However, even if all funds were donated to charities and used for charitable purposes, Mr. Shurtleff cannot plausibly say that they are not raised and spent "in connection with" his election. PAC for Utah's Future has no current history of charitable. The PAC's "non-election" funds will be raised in tandem with a federal candidate committee at campaign-style events, and Mr. Shurtleff and his supporters still control PAC for Utah's Future. It is probable that Mr. Shurtleff will distribute some of those funds to wield influence among the small handful of delegates who attend Utah's Republican Party convention. Unless Mr. Shurtleff will randomly pick charities from the phone book and make

<sup>&</sup>lt;sup>25</sup>11 C.F.R. § 102.17(c)(7).

<sup>&</sup>lt;sup>26</sup>26 U.S.C. § 527(e)(2). Because tax issues are not within the Commission's jurisdiction, this complaint will not elaborate on why PAC for Utah's Puture other than to say that a Section 527 organization's income and expenditures must fulfill its "exempt purpose" to not be taxable. Though there are limited exceptions to this, they would not apply to PAC for Utah's Future because the PAC is raising funds for itself to fulfill non-exempt purposes.

<sup>&</sup>lt;sup>27</sup>Shurtleff Joint Fund Invitation (Exhibit 2, attached hereto).

anonymous donations, political advantage will certainly play a part in who gets how much of these "non-election" funds. In light of these activities, the Commission has ample grounds to find reason to believe this "soft money" is raised and spent "in connection with" Mr. Shurtleff's federal election.

Even if the Commission were to find that there is insufficient basis to conclude that the PAC for Utah's Future funds will not be used "in connection with" the Shurtleff senate bid. Mr. Shurtleff's solicitations of unlimited corporate and individual contributions still violate federal law. Under Commission regulations, federal candidates are only able to solicit contributions in federally permissible amounts from federally permissible sources in connection with federal and non-federal elections.<sup>28</sup> Federal candidates, however, have limited permission to solicit unregulated "soft money" for non-profit entities organized under 26 U.S.C. § 501(c) and for certain types of "generic" voter registration and get-out-the-vote efforts.<sup>29</sup> Neither of these "soft money" solicitation exemptions apply here. Of particular note, PAC for Utah's Future is not a 501(c) organization and is therefore not subject to Internal Revenue Service rules (i.e. prohibitions and taxes) that discourage election activity. While the PAC has promised not to use some of its income for election-related activities, Congress purposely crafted this exemption so that it applies only to 501(c) organizations - groups that are otherwise legally discouraged from electioneering. Unfortunately for Mr. Shurtleff, Commission regulations do not allow federal candidates to solicit unregulated money for political organizations that merely pledge to use funds only for "occasional charitable donations or other purposes permitted by law." Utah state disclosure reports on their face seem to show that General Shurtleff has already solicited and received \$22,618.155 in illegal corporate contributions since becoming a federal candidate on May 12, 2009. Because Mr. Shurtleff plans to solicit additional large amounts of "soft money" through his joint fundraising process, the Commission should act to immediately hold him accountable for these actions.

#### C. Mr. Shurtleff Is Illegally Spending "Soft Money" to Support His Campaign.

Mr. Shurtleff's first disclosure report to the Commission was suspiciously bare. It listed only two itemized expenditures: one \$192.79 expenditure for "office supplies" and one \$500 expenditure for "booth rental" the Shurtleff campaign claimed to spend only \$861.65 between Mr. Shurtleff's announcement date on May 12, 2009<sup>32</sup> and June30, 2009. The campaign's two

<sup>&</sup>lt;sup>28</sup>11 C.F.R. §§ 300.61, 300.62

<sup>&</sup>lt;sup>39</sup>2 U.S.C. § 441i(e)(4); 11 C.F.R. § 300.65

<sup>&</sup>lt;sup>30</sup>Utah August 2009 Report of PAC for Utah's Future, at 5-6 available at http://gval.utah.gov/disclosures/PublicArchive.aspx?type=PAC&folder=2551.

<sup>&</sup>lt;sup>31</sup> Friends for Shurtleff, Inc. July 2009 Quarterly Report to the Federal Election Commission at 23 (Exhibit 1, attached hereto.)

<sup>&</sup>lt;sup>12</sup>Josh Kraushaar, The Pitfalls of Twitter, the Politico Blog (May 13, 2009 at 9:14 AM ET), at http://www.politico.com/blogs/scorecard/0509/The\_pitfalls\_of\_Twitter.html.

<sup>&</sup>lt;sup>13</sup>Friends for Shurtleff, Inc. July 2009 Quarterly Report to the Federal Election Commission at 2 (Exhibit 1, attached hereto.)

itemized expenditures and low spending only raise suspicion because the campaign boasts a fully functioning website, occupies office space, holds public events, gives away merchandise, mobilizes volunteers, and distributes campaign materials. The absence of web development, rent, office equipment, office utility, venue rental, catering, and merchandise payments raises questions about how Mr. Shurtleff's campaign is paying for its activities.

One possibility, which should be investigated, is that the Shurtleff campaign is allowing Guidant Strategies to advance these expenses on the Senate campaign's behalf. But this would be an unlawful corporate in-kind contribution, as it is unlikely that Guidant Strategies is in the business of providing these widely varied services.<sup>34</sup>

An equally likely and also illegal possibility which should be investigated is that the Shurtleff campaign is tapping "soft money" political organization to pay these expenses. The Shurtleff-run PAC for Utah's Future has raised \$260,498.55 from 46 contributors in 2009, according to Utah state disclosure reports. Only \$1,815 (or.69%) of the total amount and 7 of the 46 contributions were permissible under federal law. State disclosure reports show that this state PAC "soft money" is apparently underwriting Mr. Shurtleff's federal campaign. PAC for Utah's Future has spent nearly \$10,000 for campaign signs, non-fundraising events, and "volunteer thank you" expenses during a year in which no state-level election will be held and non-federal campaigning has been minimal. In addition, unlike Shurtleff's Senate campaign, PAC for Utah's Future has paid rent and equipment costs for an office that the campaign and PAC share. Even more troubling, PAC for Utah's Future has transferred \$150,500 to Mr. Shurtleff's Attorney General campaign committee, which will not report its expenditures until 2010. Shurtleff's representatives have claimed that this six-figure transfer paid down the Attorney General campaign's debt. This claim is suspect, however, because the Shurtleff Attorney General campaign has only shown large surpluses on its state reports.

Congress has passed clear laws to regulate campaign fundraising and expenditures in an effort to create fair elections on fairly based economic foundations. This complainant is concerned that the essence of these laws be enforced and that mere lip service and apparent cover through transparent schemes. This is no substitute for compliance and, therefore, I request that these issues be fully and completely investigated and addressed.

<sup>&</sup>lt;sup>34</sup>11 C.F.R. §§ 100.52(d)(1)-(2), 116.3.

<sup>&</sup>lt;sup>35</sup>Utah August 2009 Report of PAC for Utah's Future, at 2-6, available at http://gva1.utah.gov/disclosures/PublicArchive.aspx?type=PAC&folder=2551.

<sup>36</sup> Id., at 7-12

<sup>&</sup>lt;sup>37</sup>ld. at 1; Fed. Election Comm'n, Statement of Candidacy (Form 2) for Mark Shurtleff, http://query.nictusa.com/cgi-gin/fecims/? 29020210282+0.

<sup>&</sup>lt;sup>38</sup>Associated Press, Bennett Says Shurtleff May Be Violating FEC Laws, Sept. 2, 2009.

<sup>&</sup>lt;sup>39</sup>Shurtleff 2008, Utah Lieutenant Governor Year End 2008 Report, http://gva1.utah.gov/disclosures/PublicArchive.aspx?type=PCC&folder=1045&year=2008.

This Complaint is a compilation of information which I have received and reviewed and I have relied on that research to be accurate. I have no personal knowledge of the motives or intentions of candidate Shurtleff and only reach certain conclusions based upon the actions and law cited and upon circumstances which fairly lead to these logical conclusions and my resultant request for investigation action, if appropriate.

#### **CONCLUSION**

For the reasons stated above, I, Joseph E. Tesch, hereby file this complaint against Utah Attorney General Mark Shurtleff whose business address is 350 North State Street, Suite 230, Salt Lake City, Utah 84114-2320.

Respectfully Submitted this 16 day of October, 2009

Joseph L. Tesch

Tesch Law Offices, P.C.

County of Summit ) ss. State of Utah )

Sworn and subscribed before me this \_\_\_\_\_\_\_day of \_\_\_\_\_\_\_, 2009.

Notary Public
Notary Public

# **EXHIBIT 1**

### FEC FORM 3

# REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee

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### **DETAILED SUMMARY PAGE**

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	FEC Form 3 (Revised 02/2003)			Page 4
	IL DIÈGURÉEMENTS	COLUMN A Total Thin Period	COLL Election G	Aspripage Name in page
7.	CPSIATING EXPENDITURES	801.85		<b>86</b> .18
e.	TRANSFERS TO OTHER AUTHORISED COMMITTEES	- <b>a</b> •io		i 0.00
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L	SUBTOTAL joid Line 25 and Line 24) TOTAL DISSURSEMENTS THIS PERIOD (I			105382.1

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## CONSOLIDATED REPORT OF GROSS RECEIPTS FOR AUTHORIZED COMMITTEES (11 CFR 104.) 8) (Millionaireo Amendriori)

	Name of Candidate MARK SHURTLEFF Name of Principal Campaign Commit PRIENDS FOR SHURTLEFF INC.  Committee Address 150 WEST 500 NORTH STE 100	ilee	Committee ID Num Committee ID Num C 000482814	
	City State PROVO UT	ZiP 84601		
	Report Covering Period (check one)	x through June 30, or the preceding the year of the gen		
	_	Primary	General	
	Grees receipts of authorized	30300.00	24000 0	
	Aggregate amount of contributions from personal funds of the candidate*	0.00	, D.	0
3	Grees receipte minus the candidate's personal contributions	. <b>30200'0</b> 0	24006.	<b>D</b> O

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	Making Address 5864 BOUTH GREET	NETREET	05 30 2009
	C2) MURRAY	<b>State</b> Zip Code UT 6423	Transaction Res SA11AL4231 Amount of Each Residu the Period
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	Cay	State Zip Code	Transaction It: 8A11ALA234 Amount of Each Receipt this Porton
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## **EXHIBIT 2**

SHPC

### THE STREET CHIEF LINE SHEET LY

Cordially invites you to the

# STH ANNUAL WASATCH SHOTCHN BLAST

Trap and .22 Shooting Competition

For an exciting evening of shooting, distinct, prices and country music

Date and Times WEDNESDAY, SEPTEMBER 16, 2009

4:00 PM-9:00 PM

Locations Browning Worldwide Headquarters

6175 Cottonwood Canyon Road Mountain Green, Utah 84050

Entry Fee: \$5,000 per three person team

\$2,000 per person

Please RSVP by muil or call 888.308.2010

Paid for by Shurdeff Joint Fund

Contributions are not tax declarable as charinable donations. Shartleff Joint Pand is a joint fundacising commitmee benefitting Prisade for Shartleff Inc. (principal compaign commitmee of Amonney General Shurtleff's sensetorial compaign) and a non-election account of PAC for Utahls Putants (a Utah registered commitmee). Contributions permisable for the sensetorial commitmee will be attributed to the sensetorial commitmee. (Individuals, sole proprietorships, partnerships, and LLCs treated as permetables any contribute \$2,400 per election, and federal multicandidates PACs may contribute \$5,000 per election.) Other contribution amounts will be attributed to a separate account of PAC for Utah's Putant and used for non-election perposes, such as occasional charinable dotations, or other purposes permitted by less. Notwichteneding the allocation described, a contributor may designate a contribution for a particular participant, subject to legal allocation. Corporations, labor organizations, foreign autionals, and federal governments contribution that would exceed the amount permittible for the senatorial committee, the allocation of the contribution will be adjusted. All contributors will receive notice of how their funds were allocated. Please note that federal less probables any contributor from being reimbutted by another person for a contribution.

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C) Yes, I will be seconding the 6th Annual Wasseth Shorgan Blast.  Total number of genes in my pusyBecland is my check for 8	
© No. I am unable to attend, but I'd like to support Mark Shardoff's leadership.  ENCLOSED IS MY CONTRIBUTION OF:  © \$500 © \$1,000 © \$2,500 © \$5,000 © Other \$	
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